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**FCC MAIL ROOM**

*Warren T. Reese*

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*Santa Rosa CA*

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*20 September 1998*

*FCC Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington D.C. 20554*

*Dear Magalie Roman Salas,*

*Please accept these comments on NPRM (Docket) 98-143.*

*I understand that an original and four copies should be submitted, but I am enclosing a couple extras "just in case" they might come in handy. Also I am sending diskettes to the appropriate parties.*

*A text copy of this document is available on the web at:*

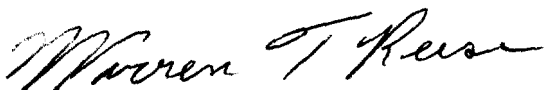
*<http://www.jps.net/radions/Comment.txt>*

*A WordPerfect 5.1 for Windows is available on the web at:*

*<http://www.jps.net/radions/Wreese.wpd>*

*Please feel free to contact me at any time.*

*Respectfully,*



*Warren T. Reese*

*WB6TMY*

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In the Matter of                      OCT - 7 1998                      )                      NPRM 98-143  
1998 Biennial Regulatory Review -                      )                      RM-9148  
Amendment of Part 97 of the                      )                      RM-9150  
FCC MAIL ROOM                      )                      RM-9196  
Amateur Service Rules.

COMMENTS OF DATE: September 20. 1998

#### INTRODUCTION

Warren T. Reese  
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Telephone: 707-527-8124

I have received the following FCC licenses:

- Los Angeles CA Dec 22, 1967 - Radio Telephone First Class P1-11-25495
- San Francisco CA Feb 11, 1976 - Amateur Extra Class WB6TMY AE-12-352
- San Francisco CA Sep 21, 1977 - First Class RadioTelegraph T1-12-2737
- Gettysburg PA Jul 18, 1994 - GMDSS Radio Maintainer License DM-GB-3090

These licenses have been maintained and renewed as their form has evolved through the years. The first 10 years of my employment was spent at broadcasting stations across the United States in various capacities. In 1976 I began 21 years service for Coastal Telegraph Station KPH. 15 years as a radio telegraph operator and 6 years more as the transmitter technician. Currently I am employed in a technical capacity in the broadcasting industry.

I appreciate the opportunity to present these comments and request the Commission to consider the possibility that I represent an example of "Expansion of the existing reservoir of trained operators, technicians, and electronics experts;" having started as an amateur in 1964 with the Novice callsign WN6KXH.

#### TEXT

In brief summary, I have four concerns:

1. Providing an influx of new operators to assure continued viability of the Amateur Radio Service.
2. Encouragement of technical proficiency and operating skills.
3. Alleviation of the ever increasing overcrowding in the HF amateur bands.
4. Protection of Amateur Service traditions.

In specific, I would like to comment:

#### A. License Classes (NPRM para. 12)

I agree that there should be 4 license classes. No amateur should lose present privileges; where applicable I recommend expanded privileges as a greatly preferable choice.

#### 1. Introductory Class (Current No-Code Technicians)

- a) Technician written exam
- b) Privileges: Same as current No-Code Technician VHF privileges

## 2. Intermediate Class

(Pre-1987 Tech, Tech Plus, Novice)

- a) Written General Class exam and 5 wpm code element
- b) Privileges HF Telephone: Same as current General Class License
- c) Privileges HF digital and CW: Same as current Extra Class License

## 3. Advanced Class

- a) Written Advanced Class & Extra Class exam plus 12 wpm code element
- b) Privileges HF Telephone: Same as current Advanced Class License
- c) Privileges HF digital and CW: Same as current Extra Class License

## 4. Extra Class

- a) Holder of a valid Amateur Advanced Class license
- b) Holder of a valid General Radiotelephone Operators License
- c) Holder of a valid First Class Radiotelegraph Operators License, or a passing grade on applicable code elements.
- d) Privileges: Same as current Extra Class License

## 5. Discussion:

- a) The outline I propose is similar to the ARRL's July 1998 proposal and has an element that should enhance technical and CW skills. As with both the ARRL proposal and the NPRM, voice operating frequency privileges are used as a motivation.
- b) The Introductory License technical exam should be eased as necessary to maintain an influx of new operators to the Amateur Service.
- c) The Extra Class License should be an "aspiration" that leads the Amateur Service to create an "Expansion of the existing reservoir of trained operators, technicians, and electronics experts." As such, anytime more than 5% of the total licensees achieve this goal, the requirements should be increased. At present, requiring parity with commercial licenses would be appropriate, but should by no means be considered the maximum requirement to achieve this license.
- d) To accommodate the ever-increasing congestion on the HF amateur bands, it is important and necessary to economize on use of bandwidth. In accordance, this plan gives no increase to voice frequencies, where bandwidth is at it's greatest. Instead, it gives enhanced frequency privileges to narrower bandwidth digital and CW modes.
- e) In view of the history and tradition of the Amateur Radio Service, and in consideration of the ever-decreasing actual spectrum available to CW operators, this plan would create a new sub-band of the low end of each HF band limited to CW (A1A) emissions. I would recommend setting 25% of each HF band aside for this purpose, but in no case in excess of 50 kHz.

## B. Deleting the Novice Bands (NPRM para. 12)

I concur with the deletion, but with the stipulation that the Novice bands should be released for digital modes, not voice/image modes.

## C. How the Novice bands should be distributed (NPRM para. 12)

- 1. The Novice portions of 80, 40, 15, and Novice CW sub-band on 10 meters should be released to digital modes, not voice modes.
- 2. Added spectrum given to the digital modes should enable the establishment of CW (A1A) emission only sub-bands on the lower end of all HF Bands.

## D. Allow General (Intermediate) and Advanced VE's to test applicants of lower license class (NPRM para. 14)

I concur completely. Good proposal.

E. How many levels of CW exam? (NPRM para. 24)

I favor three levels: 5, 12, and 20/25 wpm.

1. A 5-wpm element will help to secure an influx of new operators into the HF portions of the Amateur Service.
2. A 12-wpm element instead of 13 wpm will bring the Advanced Class into alignment with the Europeans under CEPT.
3. At present a 25-wpm plain language/20-wpm coded groups requirement using the existing First Class Radiotelegraph License code elements would give stature to the Extra Class license that it now sorely lacks. At some future point, the code requirements for this license class could be increased to 30/25 or greater.

E. Type of CW exam (NPRM para. 24)

1. I favor a test of 1-minute solid copy out of 5 minutes.
3. Only use multiple choice or fill-in blanks on accommodated exams for persons with disabilities.

F. CW Exam Waivers (NPRM para. 25)

I agree with the ARRL that the candidates for a CW exam waiver should attempt an accommodated test before being allowed a waiver.

G. Are the Categories of the Questions Adequate? (NPRM para. 27)

1. For the Introductory License the current question categories level of difficulty might well be reduced. This license should be intended to create an influx of new operators for the Amateur Radio Service.
2. For the Intermediate Class License the present pools are adequate.
3. For the Advanced Class License the present Advanced & Extra Class pools are adequate.
4. For the Extra Class License at this time an appropriate question pool would be holding a valid General Radiotelephone Operator License. Requiring this license to obtain the Extra Class would grant stature to this class of license it now sorely lacks. In some future time, the requirements could be increased by requiring possession of the GMDSS, GROL, and Second Telegraph licenses and could even include a BSEE degree. There should be no upward limit on the difficulty of obtaining this license; any time more than 5% of the total amateur population has achieved this level, it should be increased.

CONCLUSION

I hope these comments prove helpful. Once again, thank you for the opportunity to comment on the restructuring proposal.

Sincerely,

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Parties to Sections 1.415 and 1.419 of the Commission's Rules, 47 C.F.R. §§ 1.415, 1.419, interested parties may file comments on or before December 1, 1998 and reply comments on or before January 15, 1999. Comments may be filed using the Commission's Electronic Filing System (ECFS) or by filing paper copies. See Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24, 121 (1998).

36. Comments filed through the ECFS can be sent as an electronic file via the Internet to <http://www.fcc.gov/e-file/ecfs.html>. Generally, only one copy of an electronic submission must be filed. If multiple docket or rulemaking numbers appear in the caption of this proceeding, however, commenters must transmit one electronic copy of the comments to each docket or rulemaking number referenced in the caption. In completing the transmittal screen, commenters should include their full name, Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic comment by Internet e-mail. To get filing instructions for e-mail comments, commenters should send an e-mail to [ecfs@fcc.gov](mailto:ecfs@fcc.gov), and should include the following words in the body of the message, "get form <your e-mail address>." A sample form and directions will be sent in reply.

37. Parties who choose to file by paper must file an original and four copies of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, commenters must submit two additional copies for each additional docket or rulemaking number. All filings must be sent to the Commission's Secretary, Magalie Roman Salas, Office of the Secretary, Federal Communications Commission, 1919 M St., N. W., Room 222, Washington, D. C. 20554.

38. Parties who choose to file by paper should also submit their comments on diskette. These diskettes should be submitted to: MJDePont, Public Safety and Private Wireless Division, Wireless Telecommunications Bureau, Room 8332, 2025 M Street, N. W., Washington, D. C. 20554. Such a submission should be on a 3.5 inch diskette formatted in an IBM compatible format using WordPerfect 5.1 for Windows or compatible software. The diskette should be accompanied by a cover letter and should be submitted in "read only" mode. The diskette should be clearly labelled with the commenter's name, proceeding (including the lead docket number in this case, WT Docket No. 98-143), type of pleading (comment or reply comment), date of submission, and the name of the electronic file on the diskette. The label should also include the following phrase "Disk Copy - Not an Original." Each diskette should contain only one party's pleadings, preferably in a single electronic file. In addition, commenters must send diskette copies to the Commission's copy contractor, International Transcription Services, Inc., 1231 20th Street, N. W., Washington, D. C. 20037.